Addressing NEPA at the Project Level Using an Online Tool

Joan Harris & Steve Coffing
Sandia National Laboratories/New Mexico

DOE Integrated Safety Management
Lessons Learned Workshop
December 6, 2000

Sandia
National
Laboratories

NEPA

- **National Environmental <u>Policy</u> Act**

- **Procedural requirement**

- **Requires analysis of potential impacts to the "human environment" during project planning**

- **NEPA compliance may be seen as a contributing element of ISM, EMS, and QA**

Sandia National Laboratories

NEPA as an Element of ISM

- **At SNL, NEPA compliance has been viewed as one element of ISM (where "S" includes environment, safety, and health) since FY97.**

- **Conceptually, ISM software tools always included NEPA, but hazard identification and analysis tools took precedence in development.**

Sandia National Laboratories

NEPA Goals and Strategy

- **DOE/KAO and SNL/NM worked together to develop high-level goals and a strategy for achieving these goals.**

- **The statement of goal and strategy was incorporated into the SNL ISMS description document (Corporate Process Requirement CPR400.1.2, Section 4.1).**

Sandia
National
Laboratories

SNL ISMS Description

SNL assists DOE in meeting DOE's National Environmental Policy Act (NEPA) compliance responsibilities by:

- Performing internal reviews of proposed actions for potential environmental impacts as one of the initial elements of project planning, and documenting these reviews so that the DOE/KAO NEPA Compliance Officer (NCO) can easily access them.

- Identifying both those actions that are within the scope of existing DOE NEPA determinations, and actions that require additional DOE NEPA review. SNL must submit documentation to DOE/KAO for actions requiring additional DOE NEPA review.

- Making maximum use of data generated and analyzed for the Site-Wide Environmental Impact Statement (SWEIS), by incorporating facility operational descriptions, materials and effluent quantities, and hazard descriptions into NEPA review to help:

  - Ensure that operations remain within the conditions analyzed.
  - Identify when proposed actions may lie outside those conditions.

Sandia National Laboratories

ISMS Software Overview

- **Software developed per SNL ISMS software requirements and available through SNL-internal web.**

- **SNL ISMS Software NEPA Module is in beta test. Changes and improvements are expected before site deployment (planned FY01, Q2).**

- **Consists of Primary Hazard Screening (PHS), Hazard Analysis (HA), Hazard Aggregation Rollup Process (HARP), and NEPA (beta test) Modules.**

Sandia National Laboratories

Software to Support Goal

The ISMS Software NEPA Module has been developed to support the goal and strategy by:

- **Facilitating and providing a consistent approach for project reviews across the site.**

- **Ensuring that results of internal reviews are documented and available for DOE review.**

- **Generating documentation to submit to DOE when a new NEPA determination is required.**

Integration with Other ISMS Software

- **PHS used to identify hazards, including environmental, but tends to be used for "facility/lab" review rather than "project" review.**

- **PHS logic includes "NEPA warning" messages triggered by type of project, and answers, to all questions.**

- **NEPA Module can be entered separately from other modules.**

- **Future database integration planned.**

Quality Criterion 4
Documents and Records

- **NEPA Module enables documentation of SNL-internal NEPA reviews, including reviewer (training/qualifications) and rationale applied.**

- **Assists in preparation of consistent documentation for DOE review when a new NEPA determination is required.**

- **Records maintained through a corporate process.**

- **Records are more accessible than through a paper-based process.**

Sandia National Laboratories

Quality Criterion 5
Work Processes

- **NEPA Module facilitates more uniform compliance with the established NEPA process and procedures.**

- **NEPA process facilitates identification of environmental, safety, and health requirements.**

- **Module facilitates tracking and communication of requirements applicable to a particular project.**

Sandia
National
Laboratories